

IN THE SUPREME COURT OF ARIZONA

PETITIONER’S REPLY TO COMMENTS ON PETITION FOR AMENDMENT TO
SUPREME COURT RULES PURSUANT TO A.R.S., SUP. CT. RULES, RULE 28

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Introduction

On November 9, 2016, Concord Law School at Kaplan University (“CLS”) filed its petition requesting that this Court amend ARS Sup.Ct. Rules, Rule 34, to permit application to the bar via examination not only by those who graduate with a juris doctor (JD) degree from a law school accredited by the American Bar Association (ABA), but also by those who graduate from an online law school (for whom ABA accreditation is unavailable) that is part of an institution approved by one of the six regional accreditors federally recognized by the Department of Education.

Seventeen comments were submitted on the Supreme Court’s Rules Forum in response to the petition during the public comment period, which closed on May 22, 2017. Only two of those comments opposed the petition.

The Attorney Regulatory Advisory Committee (“ARC”) submitted a comment in opposition to the petition. The comment cited seven different areas in which it asserted that CLS “has not provided adequate information,” and accordingly recommended that the Court “deny the Petition based on its failure to provide adequate information to support it.”

As an initial matter, in submitting the original petition, CLS was required to comply with A.R.S 28, which limited how much information could be provided. Rule 28(A)(1)(b) provides that petitions submitted electronically “shall comply with the length and formatting requirements of Rule 28(A)(2).” Rule 28(A)(2) provides that, while a petition “may be accompanied by supporting documentation,” the “petition and supporting documentation shall not exceed 20 pages.” Even if CLS could have anticipated that the ARC would ask for all of the information identified in its comment, given that the original petition needed to provide adequate background regarding online legal education and about CLS itself (for those who are unfamiliar with either), it would not have been feasible to provide all of that data and also explain the nature of the petition itself.

The ARC comment did not assert that there was anything in the petition that affirmatively warranted denial of it, but rather merely that “[a]dequate information is required before the committee can address the actual merits of what CLS has proposed.” CLS is happy to provide the requested supplemental data below.

This petition is organized in response to the seven areas noted in the ARC comment. A brief postscript addresses any additional points raised by Professor Paul Bennett.

ARC Comment: “1. CLS has not provided adequate information to support an ‘apples to apples’ comparison of its admission standards to those of all or any subset of ABA-accredited law schools.”

Response: A full “apples to apples” comparison is not possible to provide, because the admissions processes for CLS and ABA schools are somewhat different. CLS students must take

CLS’ 40-question online admissions test, analogous to the LSAT, and meet a minimum cut score of 24 out of 40 before they are permitted to submit their application. Thus, a good deal of the “weeding out” of students occurs before applications are submitted. By contrast, most ABA schools allow any interested applicant to apply as long as they submit their application fee, regardless of their LSAT score. Accordingly, the percentage of potential applicants who achieved the minimum cut score on CLS’ admissions test is the metric that best approximates ABA schools’ acceptance rates.

As reported in CLS’ mandated disclosures, for the period from September 15, 2015 to September 2016, 37.6 percent (424 out of 1127) of its applicants scored high enough on the admissions test to move forward with their applications. Of the remaining applicants, 97.2 percent were offered admission, for an effective overall acceptance rate of 36.5 percent. By comparison, the average reported acceptance rate of the 85 ABA schools with part-time programs in 2016 was 44.6%.¹ Sixty of those schools, or 70.6 percent, accepted a higher percentage of applicants.

Although CLS cannot provide data on how its students admissions test scores correlate to specific LSAT scores, it is worth noting that the average 75th/50th/25th percentile LSAT across all 85 ABA part-time programs is 154/150/147, with 34 of the 85 schools, or 40 percent, having a 50th percentile LSAT below 150—the level that Law School Transparency has called “serious risk.”² Yet students at any one of the schools may sit for Arizona’s bar exam upon graduation.

CLS’ original petition did provide “apples to apples” data on admitted students’ UGPA compared to those of the Arizona ABA schools. Looking at national data, the average 75th/50th/25th percentile of all 85 ABA schools with part-time programs, as compared to CLS, is as follows:

Entering Student Undergraduate GPA, 2016³		
School	All ABA Part-Time	CLS (PT only)
75th percentile	3.46	3.53
50th percentile	3.21	3.16
25th percentile	2.89	2.73

Of those 85 schools, 53, or 62.3 percent, have a 75th percentile UGPA lower than CLS; 32, or 37.6 percent, have a 50th percentile UGPA lower than CLS; and 21, or 24.7 percent, have a 25th percentile UGPA lower than CLS. This data shows that the typical CLS student is competitive with the typical part-time ABA school student, who may sit for the bar exam in Arizona or any of the other 50 states without any additional showing.

¹ See Appendix A (data retrieved May 19, 2017).

² Id.

³ Id.

ARC Comment: “2. CLS has not provided adequate information as to its efforts to obtain accreditation through the American Bar Association.”

Response: Shortly after Dean Pritikin joined CLS in 2016, he contacted the ABA directly, and they made it clear that CLS would not be granted accreditation by the ABA as long as it remained a fully online school. CLS could only seek accreditation if it complied with the current limitations on distance learning (i.e., none in the first year, and no more than 15 units beyond that).

Concord has considered a hybrid online model, but conversations with dozens of alumni revealed that, due to family or work logistics or cost, most would not have been able to complete their legal education if they were required to travel to a ground campus even a few weeks a year, as is required by the Mitchell-Hamline program. CLS determined that it would undermine the value it provided to its students to shift to a hybrid model, and so has not pursued ABA accreditation further.

Although the ABA does not appear to be willing to change its stance any time soon regarding online learning, the Committee of Bar Examiners (CBE) of the State Bar of California has shown to be more receptive. On April 28, 2017, the CBE recommended state approval of a package of rule and statutory changes that would open up a path to state accreditation for distance learning schools, which is currently only available to fixed-facility schools. Distance learning schools are currently subject to many of the same regulations as fixed-facility schools, but may only be registered with, not accredited by, the CBE. One significant rule only applicable to accredited schools is that they must have a 5-year rolling cumulative pass rate on the California Bar Exam of at least 40 percent. CLS already exceeds this standard, with a 5-year rolling pass rate of 44.62 percent.⁴

ARC Comment: “3. CLS has not provided adequate information concerning its stand-alone accreditation by the Higher Learning Commission. It appears to claim accreditation by the commission solely by force of its affiliation with Kaplan University. CLS has provided no information concerning the implications of the approval of its Petition. Does the other online law school identified by CLS as being a part of an institution accredited by a federally recognized regional accreditor (St. Francis School of Law) maintain the same admission, educational standards, and bar passage rates as CLS? Will allowing the graduates of that online law school create new opportunities for Arizona citizens and expand access to legal services in underrepresented areas?”

Response: CLS is not merely “affiliate[ed] with” Kaplan University (KU); it is a part of it, and as such, is subject to periodic review along with all other KU schools and programs. As long as CLS is a part of KU, it will not be eligible for accreditation by the HLC as if it were a separate institution. When CLS was a stand-alone school, it was accredited by the Distance Education and Training Council (DETC), now known as the Distance Education Accrediting Commission (DEAC).

⁴ <https://www.concordlawschool.edu/assets/documents/business-and-professions-code-6061.7-disclosure.pdf> (visited May 21, 2017).

As noted in the petition, in 2016, HLC, after extensive review, determined KU should remain accredited through 2026 and be permitted to select the “open” pathway for future reaccreditation—an option reserved for institutions demonstrating the highest levels of quality and compliance.

In April, it was announced that Purdue University, an Indiana-based public research institution that is ranked 60th by U.S. News & World Report⁵, will acquire KU, including CLS, to extend Purdue’s reach into adult and online education and complement its land-grant mission.⁶ Purdue—which, like KU, is accredited by the HLC—plans to convert KU into a public, not-for-profit institution. Thus, the only two schools to whom the proposed rule change in Arizona would apply—CLS and St. Francis—would both have not-for-profit status.

CLS’s degree granting authority is through registration with the CBE of the State Bar of California. Through that registration, CLS is subject to a review every five years. CLS was last reviewed and granted five-year reapproval in 2014. Upon request, CLS can provide copies of the self-study required as part of the State Bar review process, which is a rigorous review of curriculum, student services, administrative services, and transparency in communications with students. Indeed, these self-evaluation reports are similar in scope and depth to those prepared in advance of ABA site evaluations, as are the annual report that CLS provides to the State Bar.

As for St. Francis, CLS can only report what is publicly available. For the most recent year, St. Francis reported admitting 41 of 84 applicants, or 48.2 percent—only slightly higher than the 44.6 percent average for all ABA part-time programs (see response to Comment 1). Although, like CLS, it does not require the LSAT, the 75th/50th/25th percentile UGPA for its most recent entering class was 3.63/3.42/2.92—higher than the ABA part-time program average (3.46/3.21/2.89).⁷

As for educational standards, St. Francis reports that its JD program requires 135 quarter-credits, and has an average class size of eight students.⁸ Students attend live classes twice per week, through face-to-face or voice-to-voice interaction, in a seemingly classic Socratic format. Students are “expected to spend a total of about 18 hours per week attending classes, engaging with other students and [their] instructor on the discussion board, writing assignments, completing projects, and other related activities.”⁹ Students submit writing assignments and take proctored final exams.

As for bar passage rates, because St. Francis opened its part-time program in 2011, July 2016 is the first and only administration of the California bar exam for which passage data is available. On

⁵ See <https://www.usnews.com/best-colleges/purdue-1825/rankings> (visited April 27, 2017).

⁶ See G. Toppo, “Purdue buys for-profit Kaplan University for \$1, plans to make it public,” USA Today, April 27, 2017, <https://www.usatoday.com/story/news/2017/04/27/purdue-buys-kaplan-university/100990102/>.

⁷ <http://stfrancislaw.com/wp-content/uploads/StFrancisDisclosure2017.pdf> (visited May 21, 2017).

⁸ Id.

⁹ <http://stfrancislaw.com/academics/class-format/> (visited May 21, 2017).

that exam, two of its three takers passed, for a pass rate of 66.6 percent.¹⁰ While this is obviously a limited data set from which to draw conclusions, nothing about it suggests that allowing St. Francis graduates, any more than CLS graduates, to sit for the Arizona bar exam presents any consumer protection risk or a dilution of attorney qualification standards.

CLS cannot report on whether allowing St. Francis graduates to sit for the Arizona Bar Exam will “create new opportunities for Arizona citizens and expand access to legal services in underrepresented areas.” CLS does not have access to St. Francis’ student or alumni data, and as just noted, St. Francis apparently has only a handful of graduates who are eligible to sit for a bar exam.

But even if CLS had such data, the request for this information is, respectfully, somewhat circular. It stands to reason that online law school students (and thus graduates) will be more likely to hail from areas with no law school nearby, which tend to be the same places that are underrepresented by lawyers. CLS can confirm anecdotally that this is the case with its own students (see response to ARC Comment 6 below). But CLS cannot demonstrate empirically that citizens from underrepresented areas of Arizona will choose to attend online law schools if given the opportunity to sit for the Arizona bar exam upon graduation, because that opportunity does not yet exist.

Because CLS has already shown that its admission standards, and those of St. Francis, are comparable to those of ABA part-time programs, unobtainable data about the intentions of hypothetical future students should not be required to approve the petition. Online law students are not ABA “rejects.” They are bright students enrolled in schools whose method of delivery provides inherent opportunities to address geographical and cost disparities in legal education that fixed-facility schools—or even hybrid online schools— not.

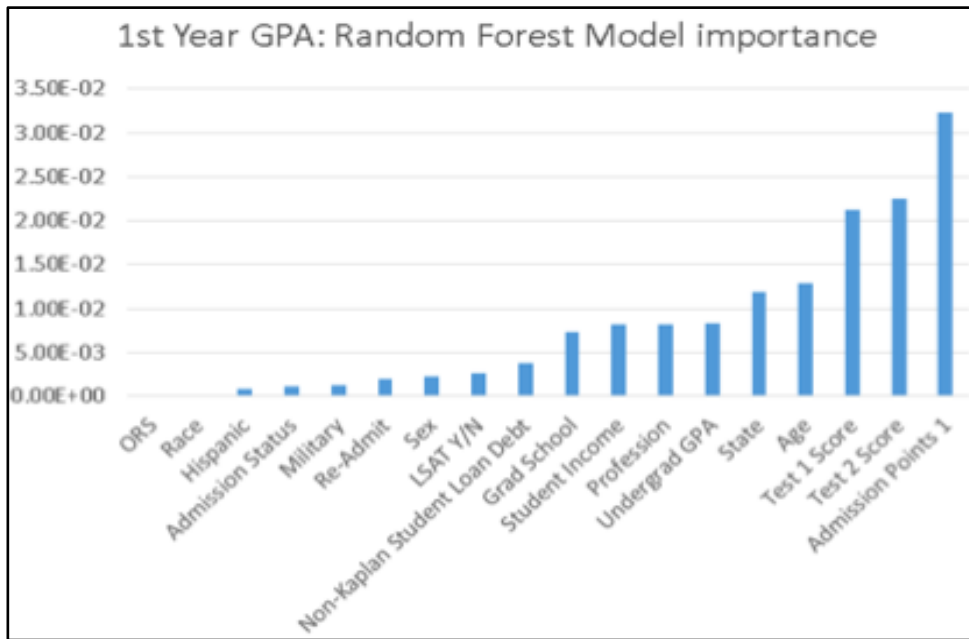
ARC Comment: “4. CLS indicates that its applicants are not required to provide a score on the Law School Admission Test when considered for admission to its program. CLS has not provided adequate information as to its use of any comparable testing mechanism to ensure its applicants have a reasonable chance of successfully completing its program if admitted (and to pass the California Bar Examination upon graduation from CLS).”

Response: CLS is unsure what additional information regarding its online admissions test would be sufficient for the ARC. The admissions test has two parts totaling 40 mostly multiple-choice questions, and is taken under timed conditions. CLS is reluctant to disclose the contents of the test itself in a publicly filed document, given that the test is proprietary, and that prospective students may thereby gain access to the questions prior to taking it, compromising the results.

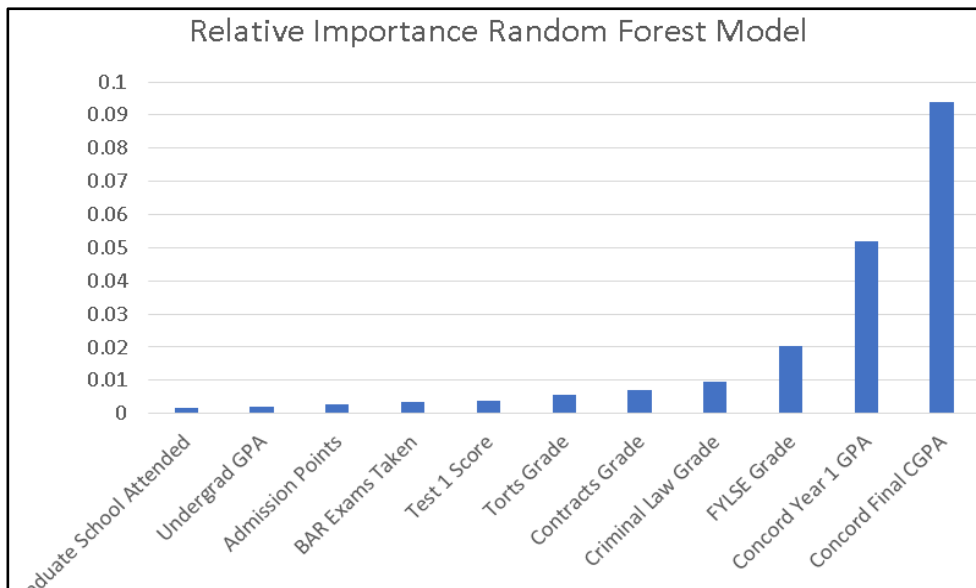
However, CLS recently conducted an internal analysis of the factors that correlate to its

¹⁰ <http://stfrancislaw.com/academics/pass-rates/> (visited May 21, 2017).

students' law school grades and success on the bar exam. Among a variety of factors, it was determined that prospective students' scores on the admissions test was more important than UGPA, and that a metric referred to as "admission points," which combines UGPA and admissions test scores, was the single best predictor of first year and overall law school grades. This is illustrated by the below chart:



1L and overall law school GPA were, in turn, the most important factors predicting bar exam success:



While there is a relatively weak correlation between UGPA or other admissions factors and bar exam passage, this is to be expected. Studies consistently show that law school performance is a far better predictor of bar exam success than the metrics that are available at admission.

ARC Comment: 5. *CLS has not provided adequate information as to the first-time taker and overall pass rates of its graduates on the California Bar Examination. CLS should have that information readily available from the date its graduates have first qualified to sit for the California Bar Examination to date. It should provide a comparison of those rates to ABA-accredited law school graduates, the graduates of California’s accredited law schools, and the graduates of California’s other registered, but unaccredited, law schools. CLS has not provided adequate information as to its attrition rates and the success of its students on the California First Year Law Student Examination (and compared to other registered, but unaccredited, law schools in California).*

Response: CLS’ original petition accurately reported its historical bar exam and FYLSE pass rates. Below and in the appendices, CLS provides the further additional data requested by the ARC.

California Bar Exam. As shown in the table below, CLS graduates’ first-time pass rate on the California Bar Exam has averaged about 34 percent, and their ultimate pass rate about 51 percent.

Total Takers	1,101
First-Time Passers	377
First-Time Pass Rate	34.2%
Repeat Passers	190
Ultimate Pass Rate	51.4%

Obviously, these are not as high as the averages among most ABA law schools. However, it would not be fair to conclude that this differential reflects inferior quality among either CLS’ graduates or its program of legal education.

CLS students are bright, but phenomenally busy. Not only must they balance their law study with full-time work and personal commitments throughout their four years of law school; they also generally do not have the luxury of taking two-and-a-half months off between graduation and the bar exam itself to study for the exam full-time, as many ABA graduates do. The below compares how many hours per week CLS students and ABA students reported spending on reading and preparing for class, on one hand, and engaging in paid work or caring for dependents, on the other:

2015 Law School Survey of Student Engagement (data on file with author)					
Metric		CLS	“Top Tier”	Peer Schools	All Schools
Hours per week spent reading and preparing for class	1L	36.18	28.91	30.21	30.66
	2L	35.90	25.43	25.49	25.94
	3L	32.11	20.60	21.06	22.21
	4L	29.44		18.90	18.52
Working for pay or providing care for dependents living with you (parents, children, spouse, etc.)	1L	45.56	5.87	8.20	9.00
	2L	40.36	9.66	10.68	12.22
	3L	46.81	10.60	12.65	13.65
	4L	48.29		29.43	34.12

CLS students who have managed to balance these 70 to 80 hour per week commitments for four years have already demonstrated incredible work ethic and strength of character—important qualities for legal professionals. Those students who have made it through CLS are arguably precisely the

candidates a state should want to allow to sit for its attorney licensing exam, and those that can pass that exam are precisely those the state should want serving its residents.

Notwithstanding these obstacles, CLS takes its obligations to prepare each of its students for the bar exam seriously, and has recently undertaken concrete additional steps in that regard. First, CLS has reached an agreement with Kaplan Bar Review, a sister company, to provide steeply discounted bar prep program to CLS' graduating students. Second, CLS has expanded its bar-oriented Capstone course from a twelve-week program to a year-long course that spans the entire 4L year. Third, CLS is revising its entire required curriculum, and is integrating both practice-oriented material and bar exam skills practice even more thoroughly in each course.

CLS can provide data regarding its performance relative to California accredited and unaccredited schools. CLS first time pass rates have been higher than those for all unaccredited schools for 14 out of 20 exam administrations for which comparative data is available, and higher than those for all California-accredited schools for 11 out of 21 such examinations. CLS' overall pass rate has been higher than that for all unaccredited schools for 19 out of 20 examinations, and higher than or equal to all California-accredited schools for 14 out of 20 examinations.)

Because ARC sought detailed comparative bar pass data on a per-administration basis, that is provided in Appendix B, broken out by first-time and overall pass rates, as requested.

FYLSE. Since CLS students started sitting for the FYLSE in October 1999, 3,402 students have taken the exam. Concord students have a first time pass rate of 31.8% and an ultimate pass rate of 48.8% (1,083 first-time and 577 repeat-taker passers, for a total of 1,660 students passing).

The CLS first-time pass rate has been higher than the first time pass rate of all takers for 24 out of 35 administrations, and higher than that of all unaccredited schools for 9 out of 20 administrations for which data is available. (Other cohorts were too small to warrant comparison.) CLS' overall pass rate has been higher than the first time pass rate of all takers as well as all unaccredited schools for 13 out of 20 administrations for which data is available. Detailed information as requested is provided in Appendix C.

Attrition. Attrition rates are admittedly high in the first year, but this is to be expected. First, many if not most CLS students are juggling their 25-plus hours per week of law study with a regular job and/or childcare responsibilities, and some find they simply cannot manage the load. Second, because students are typically older, they are more likely to experience major life events, such as divorce, health problems, or the need to care for an ailing parent, which can interfere with their studies. Third, unlike ABA students, CLS's online students must take and pass the FYLSE after their

first year, which by design “weeds out” a substantial number of students. If one looks at CLS JD students who passed the FYLSE, the historical average is that about 83 percent go on to graduate.

The following table is published on CLS’ website as part of its statutory mandatory disclosures.¹¹ It does not track attrition over time per se, as it provides snapshots at a given point in time, but it does show that through a combination of voluntary withdrawal and the FYLSE, among other factors, there are substantially more 1L students in a given term than upper division students:

4) Enrollment Data			
a) Total number of students enrolled, per class in the law school's J.D. degree program, during each of the prior three years:			
	2013-2014	2014-2015	2015-2016
1st	403	343	210
2nd	156	112	131
3rd	67	64	50
4th	99	63	61
Total J.D. enrollment	725	582	452

ARC Comment: “6. CLS has not provided adequate information as to the extent to which allowing its graduates to sit for Arizona Bar Examination will create new opportunities for Arizona citizens and expand access to legal services in underrepresented areas. CLS has provided no information as to how many Arizonans have graduated from its program, how many are currently enrolled, and how many of its graduates have expressed a concrete interest in practicing law in underrepresented areas in Arizona.”

Response: Similar to Comment 3 above, the request for information about how many CLS graduates “have expressed a concrete interest in practicing law in underrepresented areas in Arizona” is somewhat unfair. Current and prior CLS students have not had the opportunity to sit for the Arizona bar exam upon graduation, and so it stands to reason that people with an interest in practicing law in underrepresented areas in Arizona will not have enrolled in CLS in significant numbers. The question is how many people in underrepresented areas in Arizona *would* enroll in an online law school like CLS, if they could use their degree to sit for the Arizona bar exam and practice law in Arizona upon graduation. Because that opportunity does not yet exist (and will not unless the petition is granted), CLS could only speculate as to how many people would do so. If CLS must demonstrate with certainty how many people would pursue this path in the future in order for its petition to be approved, then approval is impossible based on an unattainable standard.

Based on its internal records, CLS can provide the following concrete information regarding current and former students in Arizona. Among approximately 550 current CLS students, eight students in the Juris Doctor (JD) program, and four students in the non-licensure EJD program, are

¹¹ See <https://www.concordlawschool.edu/assets/documents/business-and-professions-code-6061.7-disclosure.pdf> (visited May 21, 2017).

located in Arizona. Of these, four JD students (50 percent) and one EJD student (25 percent) reside more than 20 miles outside the major metropolitan hubs of Phoenix or Tucson. Among its approximately 1300 JD graduates, 44 were from Arizona, and among its approximately 800 EJD graduates, 28 were from Arizona. Of these, 19 of the 44 JD alumni (41 percent), and 10 of the 28 EJD alumni (35 percent), lived outside the Phoenix or Tucson areas. However, CLS must again caution that few meaningful conclusions can be drawn from this data, since enrollment trends would likely shift depending on the opportunities available. Even if only a small number of additional lawyers served underrepresented areas, that alone could be worth approving the petition.

ARC Comment: *“7. CLS has not provided adequate information to compare its program of study to the standards required of ABA-accredited law schools, separate and apart from the current ABA limitation of no more than 15 units of study allowed to be earned via distance learning.”*

Response: CLS provided a fairly detailed description of its program of study in its original petition. Nevertheless, in an effort to provide additional information, submitted herewith as Appendix D is table showing the extent to which CLS complies with the standards in Chapter 3 (“Program of Legal Education”) of the ABA Standards for Approval of Law Schools.

In sum, aside from the limit on distance learning, CLS complies with each of these Standards except for the one regarding bar passage rates. However, as noted above in the response to Comment 5, CLS students and the typical ABA student are not similarly situated in terms of their outside commitments and ability to study full-time prior to the bar exam, or so these differentials are not entirely surprising.

Professor Bennett’s Comments

Paul Bennett, a clinic professor at the University of Arizona, submitted the only other comment opposing the petition. Professor Bennett’s only argument not addressed above in the responses to the ARC comments was, effectively, that online learning simply cannot be as “good” as on-ground learning, particularly for things like skills or ethical practice.

Respectfully, CLS would submit that this is not an argument based on evidence, it is an (outdated) assumption. CLS’ live courses involve Socratic dialogue. Its student have reported in survey data that their education better prepared them for ethical practice than ABA school students did, and the evidence shows that its graduates have gone on to face state bar discipline at no greater rates (and if anything less frequently). Its students draft practice-based documents, engage in mock negotiations, and do many of the other things that students do in brick-and-mortar law schools. Indeed, CLS students have gone head-to-head in moot court competitions against schools like UCLA and UC Berkeley, and have repeatedly won awards for both their advocacy and written work.

Professor Bennett's argument also ignores that by operating entirely online, CLS is able to dramatically reduce cost and expand geographic access to qualified students who otherwise would be unable to attend law school, and who can graduate without crushing debt. Even if one were to conclude that there are *some* advantages of a traditional law school education, shouldn't Arizona residents have the opportunity to choose a more economical and flexible option for themselves, and still be given the opportunity to *sit* for the same licensing exam to become an attorney?

Conclusion

CLS is proud of the rigorous program of legal education it offers, and is equally proud of its graduates, who are able to complete its program at the same time that they are managing significant professional and personal commitments. CLS hopes that this reply has provided sufficient additional data for the Court to make an informed decision regarding the merits of its petition. However, should still further information be desired, CLS will be happy to provide it.

Respectfully submitted,

June 28, 2017

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Appendix A - ABA Part-Time Program 2016 Selectivity Data (from www.abarequireddisclosures.org)

SCHOOL	# Apps	# Offers	Accept. Rate	Matriculants	75th GPA	50th GPA	25th GPA	75th LSAT	50th LSAT	25th LSAT
AKRON, U. OF	456	188	41.2%	35	3.47	3.21	2.95	154	151	149
AMERICAN U.	479	226	47.2%	83	3.41	3.2	2.93	158	155	151
ARIZONA SUMMIT LAW SCHOOL	136	80	58.8%	32	3.28	3.02	2.57	152	144	140
ARKANSAS, LITTLE ROCK, U. OF	240	54	22.5%	34	3.49	3.28	2.84	156	151	145
ATLANTA'S JOHN MARSHALL	244	118	48.4%	71	3.3	3.08	2.76	149	147	144
BALTIMORE, U. OF	226	104	46.0%	48	3.39	3.08	2.83	154	150	147
BARRY U.	124	51	41.1%	25	3.1	2.91	2.68	153	148	145
BROOKLYN LAW SCHOOL	387	102	26.4%	34	3.54	3.31	3.1	159	156	153
CALIFORNIA WESTERN SOL	111	65	58.6%	31	3.3	2.93	2.66	152	150	145
CAMPBELL U.	46	20	43.5%	10	3.21	3.01	2.78	152	151	150
CAPITAL U.	81	56	69.1%	40	3.41	3.05	2.71	151	146	144
CARDOZO SCHOOL OF LAW	342	179	52.3%	80	3.57	3.33	3.13	157	154	151
CATHOLIC U. OF AMERICA	259	121	46.7%	35	3.44	3.22	2.89	157	154	151
CHARLESTON SCHOOL OF LAW	131	34	26.0%	17	3.12	2.98	2.73	152	144	141
CHARLOTTE SCHOOL OF LAW	208	94	45.2%	40	3.22	2.75	2.55	148	144	141
CHICAGO-KENT COLLEGE OF LAW-IIT	188	96	51.1%	38	3.49	3.17	2.97	158	152	150
CITY U. OF NEW YORK	311	100	32.2%	53	3.53	3.2	2.96	153	150	148
CLEVELAND STATE U.	88	39	44.3%	24	3.59	3.21	2.96	153	152	151
CONNECTICUT, U. OF	133	44	33.1%	27	3.46	3.24	3.05	158	155	152
DENVER, U. OF	121	64	52.9%	35	3.57	3.31	2.95	158	154	152
DEPAUL U.	183	93	50.8%	36	3.31	3.19	2.88	153	152	149
DETROIT MERCY, U. OF	92	47	51.1%	32	3.42	3.18	2.94	149	145	143
DISTRICT OF COLUMBIA	202	65	32.2%	45	3.17	2.9	2.54	151	148	146
DUQUESNE U.	92	38	41.3%	24	3.65	3.45	3.13	157	153	151
FLORIDA A&M U.	169	70	41.4%	43	3.26	2.92	2.73	149	146	144
FLORIDA COASTAL SCHOOL OF LAW	141	58	41.1%	19	3.38	2.78	2.6	147	144	142
FLORIDA INTERNATIONAL U.	121	27	22.3%	16	3.76	3.59	3.35	156	153	148
FORDHAM U.	386	109	28.2%	44	3.62	3.47	3.3	164	158	156
GEORGE MASON U.	508	73	14.4%	43	3.69	3.58	3.28	163	159	157
GEORGE WASHINGTON U.	505	117	23.2%	35	3.87	3.75	3.39	163	156	152
GEORGETOWN U.	1,381	80	5.8%	50	3.85	3.69	3.39	168	164	157
GEORGIA STATE U.	252	53	21.0%	34	3.46	3.36	3.1	158	155	152
GOLDEN GATE U.	153	90	58.8%	34	3.35	3.02	2.77	151	148	144
HAWAII, U. OF	57	23	40.4%	18	3.45	2.9	2.69	155	152	151
HOFSTRA U.	149	38	25.5%	11	3.53	3.28	3.15	156	151	146
HOUSTON, U. OF	359	54	15.0%	27	3.65	3.4	2.98	159	158	152
INDIANA U. - INDIANAPOLIS	136	98	72.1%	69	3.57	3.24	3.00	156	150	147
INTER AMERICAN U. OF PUERTO RICO	181	105	58.0%	79	3.56	3.25	2.91	140	136	134
JOHN MARSHALL LAW SCHOOL	262	149	56.9%	49	3.33	3.03	2.81	151	147	145
LEWIS AND CLARK COLLEGE	81	44	54.3%	22	3.51	3.34	3.02	160	155	149
LOYOLA MARYMOUNT U.-L.A.	939	247	26.3%	39	3.62	3.51	3.04	160	157	155
LOYOLA U.-CHICAGO	200	80	40.0%	43	3.49	3.22	2.81	160	156	151
LOYOLA U.-NEW ORLEANS	71	48	67.6%	36	3.28	3.11	2.72	150	146	142
MARYLAND, U. OF	190	63	33.2%	33	3.52	3.36	3.05	161	158	154
MCGEORGE SCHOOL OF LAW	84	51	60.7%	33	3.33	3.08	2.68	155	153	147
MICHIGAN STATE U.	88	48	54.5%	23	3.68	3.43	2.86	153	147	144
MITCHELL HAMLINE	510	308	60.4%	164	3.45	3.12	2.77	154	150	145
NEW ENGLAND LAW BOSTON	253	135	53.4%	52	3.41	3.12	2.77	154	150	146
NEW YORK LAW SCHOOL	407	165	40.5%	61	3.53	3.32	3.04	152	150	148
NORTH CAROLINA CENTRAL U.	374	87	23.3%	19	3.61	3.3	2.98	156	146	144
NORTHERN KENTUCKY U.	78	55	70.5%	32	3.39	3.14	2.98	154	149	145
NOVA SOUTHEASTERN U.	184	69	37.5%	34	3.43	3.19	3.00	150	148	144
OKLAHOMA CITY U.	45	29	64.4%	14	3.52	3.26	2.88	147	145	143
PACE U.	165	49	29.7%	11	3.43	3.05	2.66	152	149	147
PONTIFICAL CATHOLIC U. OF P.R.	103	44	42.7%	35	3.39	3.16	2.59	138	134	131
PUERTO RICO, U. OF	86	57	66.3%	54	3.68	3.45	3.19	148	143	139
QUINNIPIAC U.	83	38	45.8%	24	3.58	3.28	2.74	153	150	148
RUTGERS U.	362	120	33.1%	66	3.59	3.31	2.93	157	154	150
SAINT LOUIS U.	141	57	40.4%	22	3.57	3.35	2.98	154	153	150
SAN DIEGO, U. OF	157	52	33.1%	22	3.6	3.41	2.97	160	155	152
SAN FRANCISCO, U. OF	125	68	54.4%	29	3.29	3.08	2.91	155	152	148
SANTA CLARA U.	139	62	44.6%	23	3.46	3.33	2.84	164	157	152
SEATTLE U.	121	64	52.9%	35	3.75	3.41	3.08	159	154	150
SETON HALL U.	222	99	44.6%	37	3.46	3.13	2.95	155	150	147
S. TEXAS COLLEGE OF LAW HOUSTON	215	86	40.0%	62	3.37	3.16	2.79	152	150	148
SOUTHERN U.	164	102	62.2%	64	2.98	2.6	2.3	144	142	140
SOUTHWESTERN LAW SCHOOL	265	104	39.2%	50	3.5	3.17	3.01	154	151	149
ST. JOHN'S U.	270	88	32.6%	34	3.56	3.29	3.05	157	151	148
ST. MARY'S U.	145	75	51.7%	42	3.42	2.95	2.48	151	148	145
STETSON U.	144	57	39.6%	35	3.59	3.39	3.0	157	152	150
SUFFOLK U.	293	167	57.0%	91	3.62	3.37	3.05	155	151	147
TEMPLE U.	215	75	34.9%	37	3.67	3.37	3.11	161	158	155
THOMAS JEFFERSON SOL	127	100	78.7%	39	3.16	2.87	2.39	147	144	141
THOMAS M. COOLEY LAW SCHOOL	455	429	94.3%	366	3.2	2.9	2.6	146	141	138
TOLEDO, U. OF	51	21	41.2%	15	3.97	3.63	2.87	157	153	149
TOURO COLLEGE	203	66	32.5%	30	3.4	3.07	2.65	150	148	146
U. OF LA VERNE	166	70	42.2%	26	3.2	2.88	2.62	150	148	146
U. MASS. DARTMOUTH	98	50	51.0%	18	3.4	3.16	3.09	152	148	147
U. OF NEVADA - LAS VEGAS	90	25	27.8%	23	3.73	3.5	3.19	157	154	152
WAYNE STATE U.	64	26	40.6%	16	3.67	3.45	3.05	161	157	153
WESTERN NEW ENGLAND U.	111	58	52.3%	24	3.46	3.24	2.62	151	148	146
WESTERN STATE COLLEGE OF LAW	124	60	48.4%	40	3.25	3.09	2.71	151	148	145
WHITTIER LAW SCHOOL	127	64	50.4%	20	3.19	3.01	2.63	146	144	143
WIDENER U.-DELAWARE	192	104	54.2%	60	3.23	3.09	2.77	150	148	145
WIDENER-COMMONWEALTH	82	52	63.4%	27	3.52	3.32	2.91	154	149	145
AVERAGE	217.0	85.2	44.6%		3.46	3.21	2.89	154.0	150.3	147.2

Appendix B – California Bar Exam Pass Rate Data

California Bar Exam - Comparative First-Time Pass Rates¹²

Exam Date	CLS 1st-Time Takers	CLS 1st-Time Passers	LS 1st-Time Pass Rate	1st-Time Pass Rate All Takers	1st-Time Pass Rate Unaccredited Distance Learning	1st-Time Pass Rate Unaccredited--All	1st-Time Pass Rate California-Accredited	1st-Time Pass Rate ABA (In-State)	1st-Time Pass Rate ABA (Non-CA)
Feb-03	10	6	60%	50%	N/A	N/A	N/A	N/A	N/A
Jul-03	4	1	25%	64%	N/A	N/A	N/A	N/A	N/A
Feb-04	14	6	43%	47%	N/A	N/A	N/A	N/A	N/A
Jul-04	20	10	50%	63%	N/A	N/A	N/A	N/A	N/A
Feb-05	40	21	53%	54%	N/A	N/A	N/A	N/A	N/A
Jul-05	44	10	23%	64%	N/A	N/A	N/A	N/A	N/A
Feb-06	53	23	43%	54%	N/A	N/A	N/A	N/A	N/A
Jul-06	33	12	36%	67%	N/A	N/A	N/A	N/A	N/A
Feb-07	63	27	43%	53%	N/A	38%	31%	61%	52%
Jul-07	37	17	46%	69%	N/A	27%	32%	76%	67%
Feb-08	94	36	38%	53%	35%	28%	30%	62%	53%
Jul-08	43	19	44%	75%	33%	32%	37%	83%	75%
Feb-09	54	19	35%	46%	29%	40%	25%	53%	45%
Jul-09	45	17	38%	70%	32%	27%	32%	79%	69%
Feb-10	71	17	24%	50%	22%	23%	30%	60%	51%
Jul-10	43	9	21%	55%	18%	20%	40%	75%	68%
Feb-11	52	14	27%	42%	23%	28%	28%	63%	58%
Jul-11	32	9	28%	69%	31%	27%	35%	76%	66%
Feb-12	47	14	30%	53%	31%	33%	33%	62%	48%
Jul-12	29	7	24%	68%	20%	22%	31%	77%	64%
Feb-13	28	8	29%	52%	29%	33%	26%	61%	49%
Jul-13	36	7	19%	68%	18%	21%	36%	76%	64%
Feb-14	32	15	47%	55%	36%	35%	42%	69%	44%
Jul-14	33	9	19%	49%	19%	23%	33%	69%	60%
Feb-15	41	16	39%	39%	38%	35%	41%	54%	41%
Jul-15	20	5	25%	47%	18%	22%	21%	68%	59%
Feb-16	28	13	46%	36%	N/A ¹³	32%	23%	48%	45%
Jul-16	26	7	27%	56%	N/A	24%	21%	62%	60%
Feb-17	24	3	13%	39%	N/A	22%	18%	45%	39%

¹² The California State Bar only provides comparative data going back 10 years, to 2007. The first-time pass rates for all takers prior to 2007 is taken from the CLS website. In addition, the distance-learning category was created in 2008, so no comparative data from that category is available before then.

¹³ Beginning in 2016, the California State Bar began to limit the data it made publicly available, and so not all categories can be reported for all administrations thereafter.

California Bar Exam - Comparative Overall Pass Rates¹⁴

Exam Date	CLS Overall Takers	CLS Overall Passers	CLS Overall Pass Rate	Overall Pass Rate All Takers	Overall Pass Rate Unaccredited Distance Learning	Overall Pass Rate Unaccredited--All	Overall Pass Rate California-Accredited	Overall Pass Rate ABA (In-State)	Overall Pass Rate ABA (Non-CA)
Feb-03	10	6	60%	N/A	N/A	N/A	N/A	N/A	N/A
Jul-03	5	1	20%	N/A	N/A	N/A	N/A	N/A	N/A
Feb-04	19	8	42%	N/A	N/A	N/A	N/A	N/A	N/A
Jul-04	26	10	38%	N/A	N/A	N/A	N/A	N/A	N/A
Feb-05	52	24	46%	N/A	N/A	N/A	N/A	N/A	N/A
Jul-05	60	12	20%	N/A	N/A	N/A	N/A	N/A	N/A
Feb-06	83	29	35%	N/A	N/A	N/A	N/A	N/A	N/A
Jul-06	66	15	23%	N/A	N/A	N/A	N/A	N/A	N/A
Feb-07	111	35	32%	37%	N/A	18%	15%	45%	40%
Jul-07	74	22	30%	56%	N/A	15%	18%	67%	58%
Feb-08	137	42	31%	40%	24%	16%	18%	47%	44%
Jul-08	102	30	29%	62%	22%	21%	25%	74%	65%
Feb-09	109	30	28%	34%	19%	20%	14%	43%	37%
Jul-09	104	31	30%	56%	21%	16%	21%	70%	60%
Feb-10	124	25	20%	37%	17%	15%	21%	49%	39%
Jul-10	118	22	19%	55%	16%	13%	22%	68%	58%
Feb-11	119	29	24%	42%	18%	17%	21%	54%	47%
Jul-11	109	14	13%	55%	12%	11%	19%	68%	57%
Feb-12	125	27	22%	42%	19%	19%	26%	53%	42%
Jul-12	100	21	21%	55%	16%	15%	19%	69%	55%
Feb-13	87	16	18%	41%	14%	17%	18%	53%	42%
Jul-13	107	13	12%	56%	10%	13%	23%	70%	55%
Feb-14	90	26	29%	45%	22%	22%	28%	60%	41%
Jul-14	86	10	12%	49%	9%	11%	19%	62%	49%
Feb-15	91	21	23%	40%	20%	21%	20%	49%	39%
Jul-15	67	10	15%	47%	13%	11%	13%	60%	47%
Feb-16	75	18	24%	36%	N/A ¹⁵	14%	18%	46%	35%
Jul-16	77	12	16%	43%	N/A	13%	13%	54%	48%
Feb-17	68	6	9%	35%	N/A	11%	16%	46%	35%

¹⁴ The California State Bar only provides comparative data going back 10 years, to 2007. The overall pass rates for all takers prior to 2007 is taken from the CLS website. In addition, the distance-learning category was created in 2008, so no comparative data from that category is available before then.

¹⁵ Beginning in 2016, the California State Bar began to limit the data it made publicly available, and so not all categories can be reported for all administrations thereafter.

Appendix C – California First Year Law Students Exam Pass Rate Data

California First Year Law Students' Exam - Comparative First-Time Pass Rates¹⁶

Exam Date	CLS 1st-Time Takers	CLS 1st-Time Passers	CLS 1st-Time Pass Rate	1st-Time Pass Rate All Takers	1st-Time Pass Rate Unaccredited Distance Learning	1st-Time Pass Rate Unaccredited-- All	1st-Time Pass Rate California-Accredited	1st-Time Pass Rate ABA (In-State)	1st-Time Pass Rate ABA (Non-CA)
Oct-99	20	7	35%	31%	N/A	N/A	N/A	N/A	N/A
Jun-00	28	8	29%	28%	N/A	N/A	N/A	N/A	N/A
Oct-00	26	7	27%	34%	N/A	N/A	N/A	N/A	N/A
Jun-01	83	35	42%	32%	N/A	N/A	N/A	N/A	N/A
Oct-01	54	25	46%	32%	N/A	N/A	N/A	N/A	N/A
Jun-02	130	58	45%	34%	N/A	N/A	N/A	N/A	N/A
Oct-02	73	25	34%	26%	N/A	N/A	N/A	N/A	N/A
Jun-03	150	69	46%	32%	N/A	N/A	N/A	N/A	N/A
Oct-03	97	33	34%	28%	N/A	N/A	N/A	N/A	N/A
Jun-04	209	74	35%	30%	N/A	N/A	N/A	N/A	N/A
Oct-04	182	70	38%	36%	N/A	N/A	N/A	N/A	N/A
Jun-05	231	83	36%	32%	N/A	N/A	N/A	N/A	N/A
Oct-05	138	54	39%	32%	N/A	N/A	N/A	N/A	N/A
Jun-06	206	62	30%	25%	N/A	N/A	N/A	N/A	N/A
Oct-06	111	41	37%	25%	N/A	31%	8%	31%	0%
Jun-07	118	27	23%	22%	N/A	22%	11%	27%	0%
Oct-07	72	24	33%	19%	N/A	24%	19%	13%	0%
Jun-08	143	57	40%	31%	36%	32%	28%	40%	0
Oct-08	86	17	20%	23%	19%	23%	0%	35%	0%
Jun-09	130	37	29%	28%	28%	25%	14%	38%	25%
Oct-09	85	21	25%	27%	23%	28%	11%	30%	0
Jun-10	160	41	26%	28%	26%	29%	14%	11%	0%
Oct-10	94	23	25%	24%	24%	27%	0%	28%	---
Jun-11	134	37	28%	26%	26%	27%	14%	20%	0%
Oct-11	74	21	28%	27%	35%	31%	4%	20%	0%
Jun-12	108	19	18%	21%	20%	22%	14%	0%	0%
Oct-12	64	9	14%	22%	18%	24%	10%	14%	0%
Jun-13	106	27	26%	27%	25%	28%	21%	0%	0%
Oct-13	46	9	20%	24%	24%	25%	6%	21%	0%
Jun-14	79	15	19%	27%	31%	27%	13%	50%	---
Oct-14	32	12	38%	31%	41%	36%	0%	21%	0%
Jun-15	71	21	30%	25%	31%	27%	10%	0%	---
Oct-15	52	11	21%	25%	27%	28%	0%	10%	0%
Jun-16	45	12	27%	24%	26%	23%	N/A ¹⁷	N/A	N/A
Oct-16	28	14	50%	26%	47%	N/A	N/A	N/A	N/A

¹⁶ The California State Bar only provides comparative data going back 10 years from the most recent FYLSE administration, to October 2006. The first-time pass rates for all takers prior to October 2006 is taken from the CLS website. In addition, the distance-learning category was created in 2008, so no comparative data from that category is available before then.

¹⁷ Beginning in 2016, the California State Bar began to limit the data it made publicly available, and so not all categories can be reported for all administrations thereafter.

California First Year Law Students' Exam - Comparative Overall Pass Rates¹⁸

Exam Date	CLS Overall Takers	CLS Overall Passers	CLS Overall Pass Rate	Overall Pass Rate All Takers	Overall Pass Rate Unaccredited Distance Learning	Overall Pass Rate Unaccredited--All	Overall Pass Rate California-Accredited	Overall Pass Rate ABA (In-State)	Overall Pass Rate ABA (Non-CA)
Oct-99	20	7	35%	N/A	N/A	N/A	N/A	N/A	N/A
Jun-00	34	8	24%	N/A	N/A	N/A	N/A	N/A	N/A
Oct-00	30	7	23%	N/A	N/A	N/A	N/A	N/A	N/A
Jun-01	103	38	37%	N/A	N/A	N/A	N/A	N/A	N/A
Oct-01	87	37	43%	N/A	N/A	N/A	N/A	N/A	N/A
Jun-02	172	68	40%	N/A	N/A	N/A	N/A	N/A	N/A
Oct-02	120	39	33%	N/A	N/A	N/A	N/A	N/A	N/A
Jun-03	198	79	40%	N/A	N/A	N/A	N/A	N/A	N/A
Oct-03	166	48	29%	N/A	N/A	N/A	N/A	N/A	N/A
Jun-04	294	97	33%	N/A	N/A	N/A	N/A	N/A	N/A
Oct-04	303	101	33%	N/A	N/A	N/A	N/A	N/A	N/A
Jun-05	352	108	31%	N/A	N/A	N/A	N/A	N/A	N/A
Oct-05	276	85	31%	N/A	N/A	N/A	N/A	N/A	N/A
Jun-06	345	96	28%	N/A	N/A	N/A	N/A	N/A	N/A
Oct-06	263	86	33%	25%	N/A	27%	11%	32%	8%
Jun-07	237	47	20%	18%	N/A	19%	4%	26%	14%
Oct-07	197	51	26%	19%	N/A	19%	15%	27%	0%
Jun-08	241	82	34%	26%	31%	27%	20%	25%	11%
Oct-08	196	14	13%	15%	13%	14%	4%	30%	33%
Jun-09	226	63	28%	22%	25%	22%	18%	38%	13%
Oct-09	207	37	18%	19%	16%	19%	10%	24%	0%
Jun-10	247	59	24%	25%	23%	25%	17%	37%	0%
Oct-10	202	43	21%	20%	20%	20%	6.3%	26%	6%
Jun-11	237	49	21%	19%	19%	19%	13%	44%	0%
Oct-11	196	46	24%	19%	24%	21%	10%	21%	0%
Jun-12	192	40	21%	21%	22%	22%	13%	12%	0%
Oct-12	163	22	14%	16%	14%	16%	9%	16%	0%
Jun-13	189	49	26%	24%	25%	25%	16%	32%	0%
Oct-13	134	26	19%	19%	20%	20%	6%	25%	0%
Jun-14	152	33	22%	23%	27%	24%	9%	22%	0%
Oct-14	98	27	28%	25%	31%	28%	11%	20%	0%
Jun-15	127	26	21%	17%	21%	18%	9%	0%	0%
Oct-15	108	20	19%	20%	25%	21%	4%	25%	0%
Jun-16	61	21	34%	24%	21%	18%	6%	33%	0%
Oct-16	51	27	53%	23%	33%	25%	0%	0%	---

¹⁸ The California State Bar only provides comparative data going back 10 years from the most recent FYLSE administration, to October 2006. The first-time pass rates for all takers prior to October 2006 is taken from the CLS website. In addition, the distance-learning category was created in 2008, so no comparative data from that category is available before then.

Appendix D – CLS Compliance with ABA Accreditation Standards, Program of Legal Education

Standard No.	Summary of Standard	Summary of CLS Compliance Status
301 - Objectives of Program of Legal Education	A law school shall maintain a rigorous program of legal education that prepares its students, upon graduation, for admission to the bar and for effective, ethical, and responsible participation as members of the legal profession.	CLS requires students to complete 92 semester credit units and maintain a cumulative GPA of 2.0 ("C"). JD students with below a 1.7 after first semester are disqualified. JD students must take and pass the FYLSE. Professors hold frequent calibration sessions to ensure their grading standards are consistent with those used on the FYLSE and California Bar Exam. Students must attend 80% of lectures live or through archive, and most assignments are gated (must be completed to move forward). The required curriculum includes all MBE-tested subjects and other subjects tested on the California bar exam—12 courses totaling 66 units. CLS also requires JD students to take a 4-unit skills course in 1L; a 4-unit course in legal writing and analysis and a 2-unit legal research course in 2L; and, in 3L, a 2-unit Professional Responsibility course, as well as 2-unit Future of Law Practice, which addresses ethical, sociological, technological, and economic changes affecting the profession. CLS offers a variety of electives, including externships and a moot court team, to offer experience in practice settings and study in areas of specialization.
302 - Learning Outcomes	Law school shall have published learning outcomes that include: understanding of substantive and procedural law, legal analysis, reasoning, research, problem solving, written and oral communication, professionalism, and ethics.	CLS has 7 program level outcomes: (1) Understand the U.S. legal system and the role of law in society; (2) Formulate legal solutions to factual situations; (3) Communicate clearly and effectively in writing and orally; (4) Perform the skills essential to the practice of law; (5) Apply the knowledge and skills tested on the California FYLSE and bar exam; (6) Recognize and resolve dilemmas in an ethical manner, and (7) Act professionally and consistently with professional obligations to the community. The faculty have developed course level outcomes for each required course, and have "mapped" them to the program level outcomes. Each course level outcome must be assessed at least once through a course level assessment.
303 - Curriculum	A law school shall offer a curriculum that requires each student to complete: two credit hours of professional responsibility, one first year and one upper division writing course supervised by faculty, and six credit hours of an experiential course. The law school shall also provide substantial opportunities for law clinic, field placements, and pro bono/public service opportunities.	For professional responsibility, legal research, and legal writing courses, see 301. Experiential Courses: Moving forward, all JD students will take at least 15 units in experiential courses in the required curriculum, including a Family Law Practice course in 4L. CLS also offers a variety of elective courses that are experiential in nature, including Contract Drafting, ADR and Technology, and Patent Litigation. Clinics, Filed Placements, Pro Bono/Public Service: CLS offers field placements to upper-division JD students in the Legal Education Experience Program (LEEP). Because students are geographically dispersed, many locate their own placements. CLS undertakes to locate appropriate placements for students, and is utilizing its network of alumni to help assist in this regard. CLS is developing a program with the Legal Aid Society of Orange County (LASOC) to allow participation in live or remote pro bono and low bono opportunities by CLS students and graduates.
304 - Simulation Courses, Law Clinics and Field Placements	A simulation course does not involve an actual client but a reasonably similar experience, a law clinic involves representing an actual client, and a field placement is reasonably similar to the experience of a lawyer. All three experiences must have supervision and students receive credit.	All online simulation courses are conducted through the LMS under the direction and supervision of a faculty member, and students receive credit for such courses. Through LEEP, CLS offers exposure to clients and a professional legal practice environment. Students receive 4 credits and have to complete 160 hours over a 6-month term—80 hours of the practical training placement and 80 hours of classroom time that includes instruction, homework, and maintaining journal hours. In addition to the practical hours under a supervised professional, the class is supervised by a full-time faculty member who teaches students practical ethics, professionalism, and confidentiality, reviews journal entries, and reviews two papers that students have to write relating to their work.
305 - Other Academic Study	A law school may grant credit for courses that involve student participation in studies or activities in a	CLS allows credit for participating in moot court competitions under the supervision of a designed faculty advisor. Participation is only open to 3L or 4L students who meet minimum legal writing and overall GPA requirements. Competition members are chosen by the faculty advisor after an interview process. Students receive a letter

	format that does not involve attendance at regularly scheduled class sessions, including, but not limited to, moot court, law review, and directed research. Must have faculty supervision and students receive credit.	<p>grade based on their participation, and receive four units of credit. Moot court is also designated as an honors program on a student's transcript.</p> <p>CLS also provides opportunities for students to earn credit under the supervision of a faculty member through an Independent Study. Students must have at least a 3.0 CGPA to participate and have passed their 3rd(year). Students may choose to take the Independent Study course for 2, 3 or 4 credits. Each credit requires approximately 40 hours of student work.</p>
306 - Distance Education	<p>A law school may offer a distance education credit if: (1) there is opportunity for regular and substantive interaction between faculty member and student and among students; (2) there is regular monitoring of student effort by the faculty member and opportunity for communication about that effort; and (3) the learning outcomes for the course are consistent with Standard 302. The law school should have the technological capability to provide distance education credit. A law school shall: not grant a student more than a total of 15 credit hours toward the JD degree for courses qualifying under this Standard; not enroll a student in courses qualifying for credit under this Standard until that student has completed instruction equivalent to 28 credit hours toward the JD degree; and establish an effective process for verifying the identity of students taking distance education courses and that also protects student privacy.</p>	<p>To the extent that the Standard limits the amount of credit than can be earned through distance education to 15 credits after the first year, CLS does not comply because CLS delivers 100% of its program of legal education online. CLS complies with this Standard to the extent it sets requirements for the quality of and processes surrounding distance education credit.</p> <p>The entire CLS curriculum is distance learning and it provides for regular and substantive interaction between faculty and students. The Learning Management System (LMS) platform allows students to access all course materials (other than textbooks), video lectures, quizzes, interactive exercises, and live lectures. Students also use the platform to upload essay assignments for grading, participate in discussion boards, and track their course progress and posted grades. The live online classes, which enable two-way real-time discussions, can accommodate not only lecture but also what is effectively Socratic dialogue, with professors posing questions to students who respond via audio or text messages; discussion of previously assigned cases; solving of problems assigned before or during class; simulated oral arguments; or student presentations. CLS requires that students attend at least 80 percent of live classes, which generally occur once or twice a week, or watch archives for those in which they cannot participate synchronously (which are also available for those who simply wish to review the material). Less assertive students who may be intimidated by speaking up in a room full of peers are more likely to participate robustly online.</p> <p>For the most part, doctrinal courses at CLS utilize the same casebooks used in ABA schools across the country. The reading load is substantial, and students are frequently tested on their understanding of the material, in both multiple choice quiz and classic law school "issue spotter" essay formats.</p> <p>Learning outcomes for courses are consistent with Standard 302, per the above. CLS has more than adequate technological capability to provide distance education credit. The KU Student Records department and every other department within CLS or KU that interfaces with students is trained and prepared to deal with distance education learning.</p>
307 - Studies, Activities, and Field Placements Outside of the United States	N/A	CLS does not provide international credit.
308 - Academic Standards	A law school shall adopt, publish, and adhere to sound academic standards, including those for regular class attendance, good standing, academic integrity, graduation, and dismissal. A law school shall also have	CLS has adopted, published and adheres to policies regarding each of these. Among other things, JD students must attend at least 80 percent of classes in order to be eligible to sit for the final exam. Students who do not register attendance with sufficient frequency will be withdrawn, and "gating" ensures that students complete assignments and activities to move forward in courses. Students must maintain a 2.0 CGPA, pass the FYLSE after 1L, and earn 22 credits towards graduation each year in order to move on to the next year. Students must conduct themselves at all times in accordance with the professional standards and conduct expected of attorneys and

	written due process policies with regard to taking any action that adversely affects the good standing or graduation of a student.	future attorneys. Students must complete at least 92 credit hours within the time frame required by the State Bar of California within 5 years of passing the FYLSE, and must be in good financial standing to graduate. Students may petition for an exception to or waiver of the School policies including seeking an exception to policies related to academic standing, disqualification, and advancement.
309 - Academic Advising and Support	A law school shall: provide academic advising for students that communicates effectively the school's academic standards and graduation requirements, and provides guidance on course selection; and provide academic support designed to afford students a reasonable opportunity to complete the program of legal education, graduate, and become members of the legal profession.	<p>Pre-Start: CLS offers a "Fundamentals" program, which introduces students to the online learning environment as well as foundational knowledge and skills.</p> <p>Academic Resource Center (ARC): This includes "Start on Skills" (SOS), CLS's early intervention practice exercises, and a more advanced "Concord Essay Outreach" (CEO) program to enhance fact-analysis, issue-identification, and essay writing.</p> <p>Academic Advising: CLS has two full-time Assistant Deans of Students, both of whom hold ABA-based JDs, and one of whom also teaches courses in skills and ethics. They assist with academic support and advising. CLS also utilizes KU's Educational Advising team to address administrative questions regarding registration, scheduling, etc.</p> <p>Career Services: The KU Career Services department provides in-class and recorded touch points throughout the four years; one-on-one counseling, job search guidance, and application review; and resumes, interviewing, and networking guides.</p>
310 - Determination of Credit Hours for Coursework	A law school shall adopt, publish and adhere to written policies and procedures for determining credit hours it awards for coursework. A credit is no less than 1 hour classroom time and 2 hours outside work for 15 weeks, or equivalent time for clinic, simulation, externship, etc.	CLS requires 45 hours of student work for every credit awarded, surpassing the Department of Education 30-hour-per credit requirement. Courses are designed to provide two hours of preparation ("out of class" work) to one hour of academic engagement ("in class" work). Thus, of the 45 hours per credit, at least 15 must be "in class" hours. In some instances, the learning management system (LMS) captures or limits the actual time spent. In any event, students are required to contemporaneously verify time spent on study and preparation activities. All CLS policies are published in its catalog and publicly available on its website.
311 - Academic Program and Academic Calendar	A law school shall: provide at least 83 credit hours for graduation with 64 in regular classroom attendance classes; and require that the course of study for the JD be completed no earlier than 24 and no later than 84 months, except in extraordinary circumstances. Students cannot enroll in more than 20% of total credits per term, and cannot receive credit for pre-admission work.	<p>CLS requires 92 credits to graduate from its JD program. At 45 hours per credit, that is 4140 total hours (92 x 45) required. The ABA standard requires a minimum of 83 credits to graduate x 15 hours per credit, or 1245 per year. Assuming a standard three-year program, this is a required total of 3,735 (1245 x 3) hours required. CLS goes beyond the required ABA standard for credit hours by 400 more hours.</p> <p>CLS follows the State Bar of California guidelines for unaccredited registered law schools, which provide that JD students cannot complete their studies in less than 48 months. The CLS JD curriculum is a 92-credit program, with 84 credits in required regular coursework. Students do not take more than 24 credits a year, which is equivalent to 12 credits per ABA semester, and less than 20% of the total credit hours earned. Students cannot receive credit for pre-admission work.</p>
312 - Reasonably Comparable Opportunities	A law school providing more than one enrollment or scheduling option shall ensure that all students have reasonably comparable opportunities for access to the law school's program of legal education, courses taught by full-time faculty, student services, co-curricular programs, and	<p>CLS only has part-time students, thus it has only one program. While CLS has offered between two and four enrollment start dates per year, the curriculum, faculty, and resources are identical for each. Access to law advisors, student services, career services, financial aid services, and educational benefits for the part time program are identical no matter when a student starts.</p> <p>Students in a given term start are enrolled in "sections," so as to ensure a balance of class size, and to enable a cohort of students to share the same professors and get to know each other. Sections sizes are generally capped at 60 students per doctrinal course, 45 students per first-year skills course, and 30 students per upper-division writing courses and electives. Many courses—particularly experiential electives like</p>

	other educational benefits.	oral argumentation or patent drafting—have a dozen students or fewer.
313 - Degree Programs in Addition to JD	A law school cannot offer other degrees unless the law school is fully approved, the alternate degree is approved by Council, and the alternate degree program will not interfere with compliance of standards to carry out the JD legal education.	In addition to its four-year JD degree designed to entitle students to sit for the California Bar Exam, CLS also offers a three-year Executive Juris Doctor (EJD) program, which does not provide a path to licensure. The EJD program has been approved by the State Bar of California and the classes that CLS offers are nearly identical for both the JD and EJD students. Admissions policies and processes for EJD students are not identical but are similar to those for JD students, and some students transfer from the JD program to the EJD program during their course of study. The EJD program in no way interferences with CLS' ability to carry out its program of legal education for its JD students.
314 - Assessment of Student Learning	A law school shall utilize both formative and summative assessment methods in its curriculum to measure and improve student learning and provide meaningful feedback to students.	CLS uses frequent formative and summative assessment. After video presentations, students engage in one or more ungraded learning activities. In each module, students take a graded resource quiz based on the readings and videos, and get immediate feedback. In addition to final exams, each class typically includes several interim essays or practical assignments, most of which faculty grade. The standard turnaround time for essays is under 5 days. Faculty provide detailed model answers for essays, along with guided instructions for student review. Students further receive feedback via emails or phone calls with professors (standard turnaround time for email questions is less than 24 hours), questions during live lectures, and the ability to track grade progress on the LMS. Struggling students may also be contacted by professors or referred to Assistant Deans of Students for further support.
315 - Evaluation of Program of Legal Education, Learning Outcomes and Assessment Methods	The Dean and the faculty of a law school shall conduct ongoing evaluation of the law school's program of legal education, learning outcomes, and assessment methods; and shall use the results of this evaluation to determine the degree of student attainment of competency in the learning outcomes and to make appropriate changes to improve the curriculum.	<p>CLS prepares self-evaluation reports in advance of periodic site inspections from the State Bar of California, and submits annual reports to that body as well. CLS also prepared self-evaluation reports for its periodic inspections by the Distance Education Accreditation Committee when it was accredited by that entity. Now that CLS's accreditation is subsumed by KU's accreditation by the Higher Learning Commission, CLS contributes as appropriate to the self-evaluation report prepared for that accreditor as well. These self-evaluation reports are similar in scope and depth of those reports compiled in advance of ABA site evaluations.</p> <p>Aside from external accreditors, CLS prepares regular self-evaluations in connection with KU's internal three-year strategic planning process. CLS also prepares biannual Institutional Assessment Reports, which track and evaluate students' grades, performance on regulatory exams, practical skills development, retention rates, and satisfaction with the program of legal education and student support services.</p>
316 - Bar Passage	A law school shall demonstrate (1) that for students who graduated within last 5 years: 75% or more who sat passed, or in at least 3 of the calendar years, 75% of students graduating in those years and sat passed. (2) in 3 or more of the 5 most recently completed calendar years, the school's annual 1st-time passage rate in the jurisdictions reported by the school is no more than 15 points below the average 1st-time passage rates for graduates of ABA law schools taking the bar exam in these same jurisdictions.	CLS graduates' historical first-time pass rate is about 34 percent, and their overall pass rate is approximately 51 percent. CLS graduates within the last 5 years do not had a first-time pass rate within 15 points of the average first-time bar passage rate for graduates of ABA-approved law schools taking the exam in California.